

STATE OF INDIANA)
) SS: IN THE ALLEN SUPERIOR COURT
COUNTY OF ALLEN) CAUSE NO.

JEANNE WOODS,)
)
 Plaintiff,)
)
v.)
)
MENARDS,)
)
 Defendant.)

COMPLAINT FOR DAMAGES

COMES NOW, Ruth Poindexter (“Plaintiff”), by counsel, Glaser & Ebbs, alleges and seeks relief as follows:

1. At all times relevant herein, Plaintiff was and is a resident of Allen County, State of Indiana.
2. At all times relevant herein, upon information and belief, Menards, (“Defendant”), is an Delaware Corporation, licensed and doing business in the State of Indiana on June 24, 2020.
3. On June 24, 2020, Plaintiff was on the premises of a store owned, operated, managed and/or maintained by Defendant, in Fort Wayne, Allen County, State of Indiana (located at 5511 Meijer Drive, Fort Wayne, Indiana 46835).
4. As the Plaintiff was walking on the above-referenced premises, she fell after stepping in a crack in the floor.
5. Plaintiff’s fall was a direct and proximate result of the negligence of Defendant, such negligence including but not being limited to failing to maintain the premises in a reasonably safe condition.
6. As a direct and proximate result of the negligence of Defendant, Plaintiff has suffered severe injuries.

WHEREFORE, Plaintiff, Jeanne Woods, by counsel, prays that a judgment be entered in her favor and against Defendant Menards, in an amount commensurate with her damages, and for all other just and proper relief in the premises.

Respectfully submitted,

/s/ Michael A. Busching
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